

LAW OFFICES
BLOOSTON, MORDKOFKY, DICKENS, DUFFY & PRENDERGAST, LLP

BENJAMIN H. DICKENS, JR.
JOHN A. PRENDERGAST
GERARD J. DUFFY
RICHARD D. RUBINO
MARY J. SISAK
D. CARY MITCHELL
SALVATORE TAILLEFER, JR.

2120 L STREET, NW
WASHINGTON, DC 20037

(202) 659-0830
FACSIMILE: (202) 828-5568

AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES
BUENOS AIRES, ARGENTINA

HAROLD MORDKOFKY
OF COUNSEL

EUGENE MALISZEWSKYJ
ENGINEERING CONSULTANT

ARTHUR BLOOSTON
1914 – 1999

January 30, 2019

WRITER'S CONTACT INFORMATION

bhd@bloostonlaw.com

REDACTED – FOR PUBLIC INSPECTION

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: South Dakota Network, LLC Tariff FCC No. 1
WC Docket No. 18-100; Transmittal No. 13**

Dear Ms. Dortch:

South Dakota Network, LLC (“SDN”), by its attorneys, hereby submits amendments to Exhibit 1 of its Direct Case and Exhibit B of its *ex parte* letter of January 3, 2019. These amendments make corrections to the data provided in the respective exhibits. Pursuant to the Protective Order adopted by the Commission in this proceeding,¹ SDN requests confidential treatment for this information, which is commercially sensitive information that is not normally released to the public.

The amended Exhibit 1 to the Direct Case makes two corrections: first, it removes [REDACTED] minutes of use that were incorrectly included; second, it adds [REDACTED] minutes of use that were incorrectly excluded. The removed minutes were mistakenly identified as being associated with regulated services when, in fact, they are associated with non-regulated services and are therefore not relevant to SDN’s tariff. Conversely, the excluded minutes were mistakenly identified as being billed pursuant to contract when, in fact, they are billed under SDN’s tariff and are therefore relevant. These corrections align the methodology for compiling the 2018 numbers with the methodology for compiling the 2016 and

¹ *In the Matter of South Dakota Network, LLC Tariff F.C.C. No. 1, PROTECTIVE ORDER*, WC Docket No. 18-100, et al., DA 18-1158, released November 14, 2018.

2017 numbers (which are unchanged), and with the numbers used to calculate SDN's benchmark [REDACTED]

[REDACTED] SDN notes that these revisions do not affect its cost study, its filed rate, or its benchmark calculation.

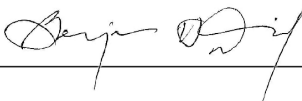
The amended Exhibit B to the January 3 *ex parte* corrects a rate band allocation error [REDACTED]. These minutes were previously associated with subtending LECs that do not participate in the NECA tariff, but should have been included in the NECA tariff's rate band 8. As a result, SDN's calculated benchmark rate for equal access is \$0.012008. This is slightly higher than its original calculation of \$.01195.³ This revision does not affect SDN's cost study or its filed rate.

In accordance with the Protective Order and the Commission's rules, one redacted copy has been filed via ECFS; one confidential, non-redacted copy has been submitted via hand delivery to the Secretary's Office; and two confidential, non-redacted copies have been submitted via hand delivery to Mr. Christopher Koves.

If you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

SOUTH DAKOTA NETWORK, LLC

By 

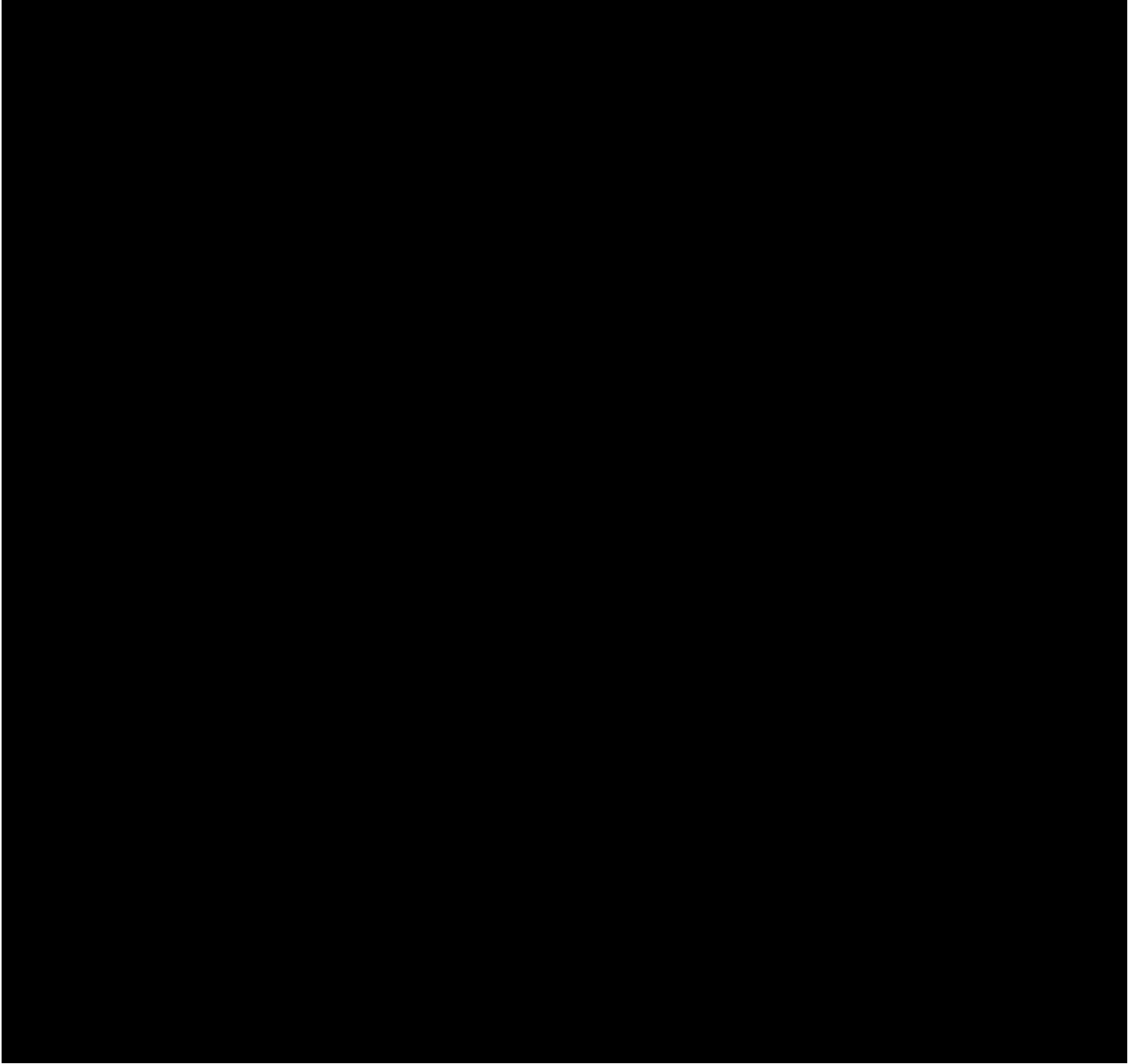
Benjamin H. Dickens, Jr.
Mary J. Sisak
Salvatore Taillefer, Jr.
Counsel to South Dakota Network, LLC

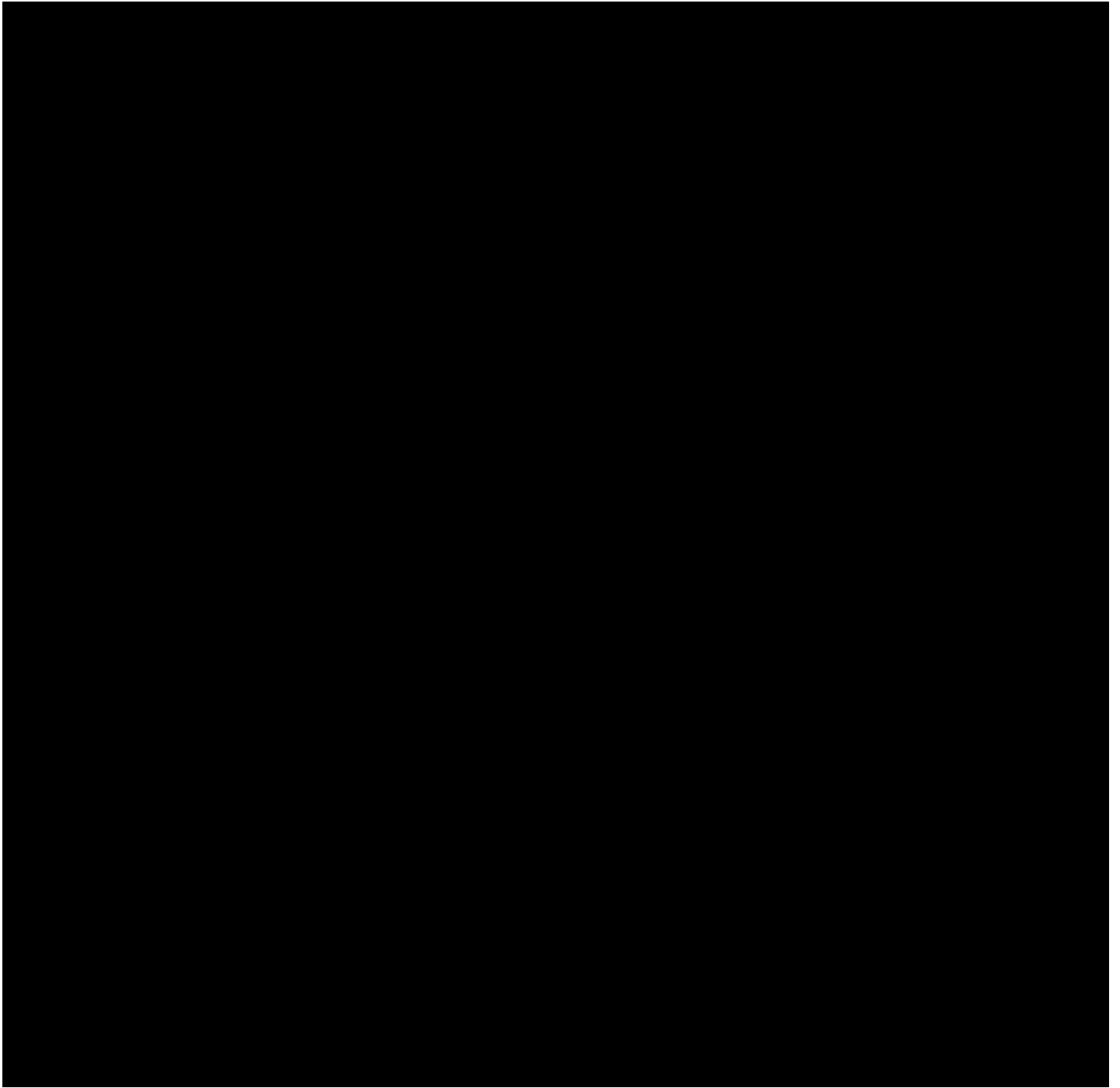
CC: Gil Strobel
Lynne Engledow
Al Lewis
Christopher Koves
David Carter
Tim Boucher

² Direct Case of South Dakota Network, LLC at p. 18. This data also supports SDN's assertion that approximately 75% of its originating traffic is sent to non-affiliated IXC's. Direct Case of South Dakota Network, LLC at p. 11. These corrections do not change that figure.

³ South Dakota Network, LLC Tariff F.C.C. No. 1, Transmittal No. 13, Description and Justification (filed Sept. 17, 2018).

REVISED EXHIBIT 1 TO
DIRECT CASE OF SOUTH DAKOTA
NETWORK, LLC
FILED DECEMBER 11, 2018





REVISED EXHIBIT B TO
WRITTEN EX PARTE OF SOUTH DAKOTA
NETWORK, LLC
FILED JANUARY 3, 2019

South Dakota Network, LLC

